

Peter Lees, Ph.D. June 20, 2003

Page 20

1 Q. Okay. In 1986, were you aware that ZAI was
2 contaminated with asbestos, or had you even
3 heard of ZAI in 1986?

4 A. No. I don't believe I had.

5 Certainly I knew about vermiculite at
6 that time. Whether I knew about its use as an
7 attic insulation at the time, I don't think so.

8 Q. Do you have any training in microscopy?

9 A. Rudimentary.

10 Q. So you wouldn't consider yourself an expert?

11 A. Not at all.

12 Q. Do you have any training in asbestos fiber
13 counting?

14 A. Again, rudimentary, but no way would I consider
15 myself an expert.

16 Q. Okay. Those aspects of your report that
17 required training in microscopy and asbestos
18 fiber county, do you rely on Dr. Lee and his
19 staff to do that?

20 A. That's correct. That's correct.

21 Q. Let's talk for a second about your expert
22 witness experience.

23 What percentage of your time, and I
24 know it probably varies by year and maybe by
25 season, but what percentage of your time, your

Peter Lees, Ph.D. June 20, 2003

Page 94

WORD
INDEX

1 recently do.

2 Q. Do you know if the air flow rate would have
3 been different if you had left the attic
4 closed?

5 A. If the hatch was closed, the air flow into the
6 attic would have been somewhat reduced would be
7 my speculation.

8 Q. Would the fiber counts have been affected at
9 all if the air flow rate was different?

10 A. I can't say for certain. For Mr. Van Cura's
11 personal samples, he was right at the source.
12 Whether a reduced air flow would have changed a
13 concentration right at the source, I really
14 can't say.

15 Q. Is it possible that it would have changed it?

16 A. I can --

17 I mean, you can come up with a
18 scenario that makes it possible. I can come up
19 with a scenario that makes it the same.

20 - - - -

21 (There was a discussion off the record.)

22 - - - -

23 BY MR. WOOD:

24 Q. Earlier you said you relied on Dr. Lee for his
25 analysis of his sampling.

Peter Lees, Ph.D. June 20, 2003

Page 95

1 A. His group, yes. I'm not certain that Dr. Lee
2 himself has looked through a microscope related
3 to this project.

4 Q. You didn't have any involvement in the issue of
5 cleavage fragments in this study, did you?

6 A. No.

7 Q. Who wrote your report? Was it you,
8 Dr. Mlynarek, or someone else?

9 A. No. No, no, no. Dr. Mlynarek and I wrote it.
10 We wrote different sections initially and I was
11 the one who put them all together, and then we,
12 you know, jointly edited it -- altered it.

13 Q. What parts of the report were you responsible
14 for initially preparing, if you remember, back
15 then?

16 A. I do remember the part that took a large chunk
17 of my time was the descriptions of the
18 different tests. I will claim that as my major
19 responsibility -- or as the major contributor
20 to that. Other than that, it's, you know --

21 People will take a shot at one
22 section and then in the end can't even remember
23 who wrote what.

24 Q. Did you or Dr. Mlynarek meet with Grace counsel
25 during the preparation or writing of your